

October 30, 2020

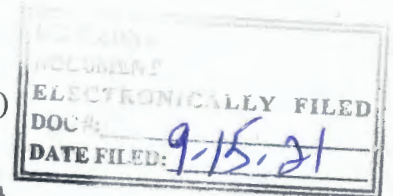
BY ECF & EMAIL

The Honorable Lewis A. Kaplan
United States District Court Judge
New York, New York 10007-1312

MEMO ENDORSED

Re: *Dennis, et al. v. JPMorgan Chase & Co., et al.*, 16 CIV. 6496 (LAK) (S.D.N.Y.)

Dear Judge Kaplan:



Pursuant to Your Honor's Individual Rules of Practice, Plaintiffs respectfully request leave to file under seal portions of Defendants' responses to document request which Defendants have marked for confidential treatment. As reasons therefore, Plaintiffs respectfully state as follows:

1. The "Protective Order" dated June 15, 2020, ECF 371, ordered by Your Honor explicitly provides: "All information of any kind provided in the course of discovery in this action, including, without limitation, written discovery responses and deposition testimony, shall be referred to as 'Discovery Material,'" ¶ 1, and "All Confidential or Highly Confidential Discovery Material filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that contain such Confidential or Highly Confidential Discovery Material, shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court." ¶ 16.
2. Defendant The Royal Bank of Scotland PLC has designated its entire Responses and Objections to Plaintiffs' First Request for Production of Documents as confidential.
3. Defendant Credit Suisse AG has designated its Responses and Objections to Request Nos. 12-16 (pp. 28-34) of Plaintiffs' First Request for Production of Documents as confidential.
4. Accordingly, under the terms of the Protective Order, Plaintiffs have been directed to file these materials under seal.

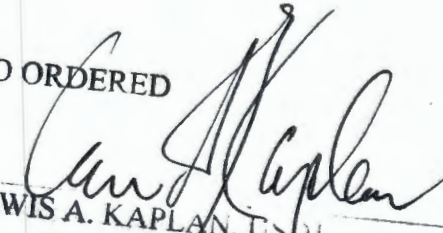
WHEREFORE, Plaintiffs respectfully request leave to file the foregoing documents under seal in their motions (ECF Dkt. 426 & 427) to overrule Defendants' time period objections, and also in Plaintiffs motion to overrule certain of Defendants' objections to the production of documents relating to BBSW-Based Derivatives.

Thank you very much.

Respectfully submitted,

/s/ Christopher Lovell
Chris Lovell

cc: All Counsel of Record (by ECF)

SO ORDERED

LEWIS A. KAPLAN, U.S.D.J.

9/15/21